

Exhibit "18"

<u>Issue</u>	<u>Deposition Topic #</u>	<u>RFP#</u>	<u>Interrogatory#</u>
<u>No timely production of documents or answers</u>		##1, 2, 7, 21, 23, 24, 25, 26, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 55, 56, 57, 58, 59, 60,	5, 7, 8, 9, 16
<u>The pre-2018 evidence dispute</u>	#1-30	##1, 6-12, 13-17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 53, 55-86	#1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 16
<u>The IP address lease log dispute</u>		#6, 44	
<u>Defendant's disparate practices between other policies that benefit it and its DMCA policy</u>		49, 50, 51, 52, 53, 76, 82	16
<u>Defendant's internal discussions of prominent ISP copyright lawsuits dispute</u>	7-8	74, 75	
<u>Defendant's profit from pirating customers dispute</u>	30	37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 49, 57, 58, 59, 61, 62, 63, 64	8, 9, 16
<u>Defendant's network monitoring practices dispute.</u>		48, 66-73, 86	
<u>Defendant's relationship with Astound dispute</u>		49	
<u>Piracy notices sent concerning other Works to same subscribers that pirated Plaintiffs' Works dispute</u>	6	47, 83, 84, 85	

Interrogatory#12 – what are the available technological measures that stop or limit reproduction or distribution over peer to peer networks of Plaintiffs' Works?